

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) GEORGE COLLINS and §
(2) ALRIKA COLLINS, §
§
§
Plaintiffs, §
§
§
§
v. §
§
Case No. 22-cv-00318-Raw-Jar
(1) STATE FARM FIRE AND §
CASUALTY COMPANY, §
§
§
Defendant. §
§

PLAINTIFFS' FINAL WITNESS AND EXHIBIT LIST

COMES NOW Plaintiffs, George Collins & Alrika Collins (“Plaintiffs”), and file Plaintiffs’ Final Witness and Exhibit List and would respectfully show the Court the following:

L.

WITNESS LIST

	WITNESSESES	DESCRIPTION
1.	George Collins By and through counsel of record, Terry M. McKeever OBA No. 21751 tmm@fylaw.com S. Slex Yafe OBA No. 21063 ay@fylaw.com FOSHEE & YAFFE P.O. Box 890420 Oklahoma City, Oklahoma 73189 Telephone: (405) 378-3033	Plaintiff and will have knowledge of Plaintiffs' claim and causes of action.

2.	<p>Alrika Collins By and through counsel of record, Terry M. McKeever OBA No. 21751 tmm@fylaw.com S. Slex Yafe OBA No. 21063 ay@fylaw.com FOSHEE & YAFFE P.O. Box 890420 Oklahoma City, Oklahoma 73189 Telephone: (405) 378-3033</p>	Plaintiff and will have knowledge of Plaintiffs' claim and causes of action.
3.	<p>Ian Rupert Ian's Enterprise 9450 SW Gemini Dr. #39525 Beaverton, Oregon 97008-7105 Telephone: (405) 622-8721</p>	Plaintiffs' public adjuster who inspected the Property and will have knowledge of Plaintiffs' insurance claim, the cause of damage to Plaintiffs' property, and the reasonable and necessary costs to return the Property back to its pre-loss condition.
4.	<p>Chad T. Williams, P.E. Valor Forensic Engineering Services, LLC P.O. Box 783 Jenks, Oklahoma 74037 Telephone: (855) 918-5111</p>	Mr. Williams was retained to evaluate the fire damage to the property and has knowledge about the damage to the Property.
5.	<p>Duane Smith Bovini Consultants P.O. Box 306 Bullard, Texas 75757 Telephone: (903) 216-0089</p>	Mr. Smith was retained to evaluate the fire damage and the reasonable and necessary cost to return the Property to its pre-loss condition and has knowledge about the damage to the Property.
6.	<p>Kevin C. Dandridge 1 Life Safety 4605 E Chandler Blvd, Suite 110-163 Phoenix, Arizona 85048</p>	Mr. Dandridge was retained to determine the proper impact and costs to safely return the property

	Telephone: (602) 799-4800	back to its pre-loss condition and will testify to same.
7.	Luke Hibbs The Mold Consultation 726 Northwest 69th Street Oklahoma City, Oklahoma 73116 Telephone: (405) 285-9100	Mr. Hibbs was retained to inspect the property for suspect areas and conditions and has knowledge about the damage to the property.
8.	Defendant's Corporate Representative By and through counsel of record, J. Andrew Brown John S. Gladd ATKANSON, HASKINS, NELLIES, BRITTINGHAM, GLADD & FIASCO 1500 ParkCentre Bldg. 525 S. Main Street Tulsa, Oklahoma 74103 Telephone: (918) 582-887 Facsimile: (918) 582-8096	Defendant and will have knowledge of the handling of Plaintiffs' claim and Defendant's denial of the claim.
9.	Heather Stanely Claim Specialist P.O. Box 106169 Atlanta, Georgia Telephone: (918) 935-5450	Ms. Stanley served as a claim specialist in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.
10.	Karla Tillberg Claim Specialist P.O. Box 106169 Atlanta, Georgia 30348-6169 Telephone: (844) 458-4300 ext. 3099944165 Facsimile: (844) 236-3646	Ms. Tillberg served as a claim specialist in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.

11.	Cheryl Penisten-Wilbur Claim Specialist P.O. Box 106169 Atlanta, Georgia 30348-6169 Telephone: (844) 458-4300	Ms. Penisten-Wilbur served as a claim specialist in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.
12.	Carmen Richwine Claims Supervisor P.O. Box 106169 Atlanta, Georgia 30348-6169 Telephone: (844) 458-4300	Ms. Richwine served as a claim supervisor in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.
13.	Sharon Arnold Supervisor/Section Manager P.O. Box 106169 Atlanta, Georgia 30348-6169 Telephone: (844) 458-4300	Ms. Arnold served as a claim supervisor/manager in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim
14.	Abby Petterson, or other Representative, ALE Solutions, Inc. One West Illinois Street, Suite 300 Saint Charles, Illinois 60174 Telephone: 630-524-0037 866-885-9785	Abby Petterson was the national accounts manager, who coordinated locating potential alternative housing arrangement benefits, and communicated extensively with State Farm on or about Loss of Use Benefits on the Plaintiffs' claim.
15.	Any witness needed to authenticate documents.	
16.	Any witness listed by Defendant and not objected to by Plaintiffs.	

17.	Plaintiffs retain the right to supplement this list as discovery is ongoing.	
-----	--	--

II.**EXHIBIT LIST**

Ex. No.	EXHIBIT	
1.	Collins' Proof of Loss, dated July 16, 2021 (COLLINS_000055-000057)	
2.	Collins' Final Request for Full Payment of Damages, dated January 10, 2022 (COLLINS_000052-000054)	
3.	Fire Department Report, dated January 11, 2021 (COLLINS_000849)	
4.	Letter assigning Claim to Special Investigative Unit, dated January 29, 2021 (COLLINS_000872)	
5.	Claim File – Description of Property Damages (COLLINS CL 36-15K5-35N 0073)	
6.	Internal Communication between Heather Stanley and Briana Storm (COLLINS CL 36-15K5-35N 0606)	
7.	Email from Derek VanDorn, dated August 9, 2021 (COLLINS CL 36-15K5-35N 0569)	
8.	Carrier Request for Engineer, dated January 22, 2021 (COLLINS CL 36-15K5-35N 0620)	
9.	Decision Letter, dated February 17, 2021 (COLLINS_000883-000885)	
10.	Decision Letter for Contents, dated March 23, 2021 (COLLINS_000995-001003)	
11.	Claim File - General Information Page (COLLINS CL 36-15K5-35N 00001)	

12.	Increase in Premium (COLLINS CL 36-15K5-35N 0016)
13.	Claim File - Payments for Services (COLLINS CL 36-15K5-35N 0023)
14.	Claim File – Decline Payment for Hygienist and Safety Experts (COLLINS CL 36-15K5-35N 0030)
15.	Photographs of Property Damage.
16.	3D Matterport of Damage to Property (accessible via link at COLLINS_000055)
17.	Chad T. Williams' inspection photographs, dated May 4, 2021 (COLLINS_000151-000169)
18.	Luke Hibbs' inspection photographs, dated June 11, 2021 (COLLINS_000333-000385)
19.	Ian Enterprise's inspection photographs of Property and Contents, dated April 23, 2021 (COLLINS_000483-000843)
20.	Wagoner County Assessor's Historical Photographs of Property in 2015 and 2017 (COLLINS_000139-000141)
21.	Duane Smith's estimate of damages, dated November 11, 2023 (SMITH_000005-000049)
22.	Ian's Enterprise, LLC Estimate, dated July 16, 2021 (COLLINS_000387-000482)
23.	Email regarding travel trailer for temporary housing, dated July 10, 2021 (COLLINS_000001028)
24.	Repurchase Invoices and Receipts (COLLINS_001020-001021, 001029-001039)
25.	Contents Cleaning Invoices and Receipts dated January 20, 2021 (COLLINS_001010-001015)
26.	Damaged Contents List, dated January 20, 2021 (COLLINS_000981-000982)

27.	Damaged Contents List, dated January 26, 2021 (COLLINS_000983)
28.	Damaged Contents List, dated January 29, 2021 (COLLINS_000984)
29.	Damaged Contents List, dated February 15, 2021 (COLLINS_000985)
30.	Damaged Contents List, dated February 18, 2021 (COLLINS_000986)
31.	Claim File - Contents Payment on April 5, 2021 (COLLINS CL 36-15K5-35N 0051-0052)
32.	Claim File – Initial Contents List (COLLINS CL 36-15K5-35N 0071)
33.	\$81,610.48 Requested Authority for Contents Payment (COLLINS CL 36-15K5-35N 0185)
34.	Rental Agreement (COLLINS_001042)
35.	All Rent Receipts (COLLINS_001040, 001043)
36.	Comparable Housing Emails regarding Property 1 (COLLINS CL 36-15K5-35N0481-0483)
37.	Email Regarding Urgency for Comparable Housing from Collins' (COLLINS CL 36-15K5-35N 0514)
38.	Carrier Request for Short Lease (3 to 4 months) (COLLINS CL 36-15K5-35N 0520)
39.	Carrier Denial of Comparable Housing for Property No. 8 (COLLINS CL 36-15K5-35N 0541, 0551)
40.	Servpro Photographs and Scanned Receipts (COLLINS CL 36-15K5-35N 7490-8111)
41.	Integrity Fire Investigations LLC Photographs (COLLINS CL 36-15K5-35N 74780-7483)

42.	Certified Policy, Policy No. 36-B3-L971-9, effective from May 9, 2020 through May 9, 2021. (COLLINS_000001-000051)
43.	Redacted Claim File for Claim No. 36-15K5-35N (including all relevant portions, like Claim Notes, Ownership Audit, Basic Claim Information-Review, claim correspondence internal and external, Document List Detail, etc. and any others)
44.	State Farm Fire and Casualty Company's Underwriting File for the Property
45.	Claim File – Berryman Notes on meeting with Chad T. Williams (COLLINS CL 36-15K5-35N 0033)
46.	Chad T. Williams' Engineer Report, dated May 11, 2021 (COLLINS_000127-000135)
47.	Chad T. Williams' CV (COLLINS_000260-000262)
48.	Kevin Dandridge's Safety Report, from June of 2021 (COLLINS_000273- 000314)
49.	Kevin Dandridge's CV (COLLINS_000328-000330)
50.	Luke Hibbs' Inspection Report, dated June 11, 2021 (COLLINS_000331-000332)
51.	Duane Smith's Report, dated November 6, 2023 (SMITH_000001-000004)
52.	Duane Smith's CV (SMITH_000050-000052)
53.	3D Matterport Diagram of Property (COLLINS_000844-000846)
54.	Any exhibits listed by Defendant and not objected to by Plaintiffs.
55.	Plaintiffs retain the right to supplement this list as discovery is ongoing.

Respectfully submitted,

/s/Preston J. Dugas III

Preston J. Dugas III

Admitted Pro Hac Vice
pdugas@dcclawfirm.com
DUGAS & CIRCELLI, PLLC
1701 River Run, Suite 703
Fort Worth, Texas 76107
Telephone: (817) 945-3061
Facsimile: (682) 219-0761

-AND-

Terry M. McKeever
OBA#21751
tmm@fylaw.com
FOSHEE & YAFFE LAW FIRM
P.O. Box 890420
Oklahoma City, Oklahoma 73189
Telephone: (405) 378-3033
ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2024 a true and correct copy of the foregoing was served on all counsel of record pursuant to Federal Rule of Civil Procedure 5(b), as follows:

via email

J. Andrew Brown, OBA #22504
dbrown@abg-oklaw.com

**ATKINSON, BRITTINGHAM,
GLADD, FIASCO & EDMONDS**
1500 ParkCentre
525 South Main Street
Tulsa, OK 74103-4524
Telephone: (918) 582-8877
Facsimile: (918) 585-8096

ATTORNEY FOR DEFENDANT SFF&CC

/s/Preston J. Dugas III

Preston J. Dugas III